
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Michael A. Hammer
 : :
 : Mag. No. 19-4041
 : :
OMAR DOOLITTLE : **Criminal Complaint**

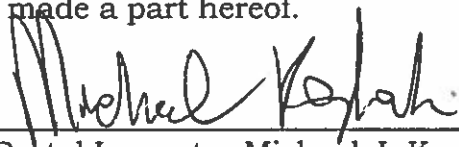
I, Michael J. Kozlowski, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Postal Inspector Michael J. Kozlowski
United States Postal Inspection Service

Sworn to before me and subscribed in my presence,

January 29, 2019
Date

at

Essex County, New Jersey
County and State

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Bank Fraud)

From at least as early as in or around July 2017 through in or around August 2018, in the District of New Jersey and elsewhere, the defendant,

OMAR DOOLITTLE,

knowingly and intentionally conspired and agreed with others to commit bank fraud, specifically, to execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the money, funds, and other property owned by, and under the custody and control of, such financial institution, by means of material false and fraudulent pretenses, representations, and promises, with the intent to deceive such financial institution, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Aggravated Identity Theft)

From at least as early as in or around July 2017 through in or around August 2018, in the District of New Jersey and elsewhere, the defendant,

OMAR DOOLITTLE,

knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a violation of Title 18, United States Code, Section 1349, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

ATTACHMENT B

I, Michael J. Kozlowski, am a Postal Inspector with the United States Postal Inspection Service. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

The Conspiracy

1. The conspiracy involves a network of individuals located in several states who used stolen credit card information to make online purchases of goods from a construction supply chain ("BUSINESS-1") for in-store pick up, which they later converted to BUSINESS-1 gift cards and then cash.

2. Specifically, the conspirators (1) purchased goods online from BUSINESS-1 using stolen credit card information, (2) picked up the goods at BUSINESS-1 stores located in New Jersey, New York, Pennsylvania, and other states, with the use of false identification, (3) returned the goods in exchange for store credit, and (4) converted the store credit into cash by making in-store purchases on behalf of BUSINESS-1 customers, at a discount and in exchange for cash.

3. To date, the total dollar amount of fraudulent online purchases of goods from BUSINESS-1 associated with the conspiracy is approximately \$950,000.

4. Chase Bank, Citibank, FIA Card Services, and U.S. Bank National Association are all financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation during all times relevant to this Complaint.

DOOLITTLE's Participation in the Conspiracy

5. Beginning in or around July 2017 through in or around August 2018, Omar Doolittle ("DOOLITTLE") and his co-conspirators placed online orders for goods with BUSINESS-1 using stolen credit card information and picked up those goods from BUSINESS-1 stores using at least ten (10) different false and/or stolen identities.

6. Law enforcement obtained store surveillance footage from BUSINESS-1 showing DOOLITTLE at various BUSINESS-1 locations (1) picking up goods which had been purchased online with stolen credit information, (2)

returning fraudulently purchased goods in exchange for BUSINESS-1 gift cards, and (3) accompanying BUSINESS-1 customers to the register and making purchases on their behalf using BUSINESS-1 gift cards.

DOOLITTLE's use of IDENTITY-1

7. On or about September 11, 2017, DOOLITTLE is pictured on BUSINESS-1 surveillance footage picking up an online order for goods placed under a false and/or stolen identity, IDENTITY-1, in Holmdel, New Jersey. The online order was placed using stolen credit card information from an IP address ending in 228.

8. From in or around August 2017 through in or around September 2017, approximately sixty-seven (67) additional fraudulent online orders were placed with BUSINESS-1 under IDENTITY-1, including many from the same IP address ending in 228.

DOOLITTLE's use of IDENTITY-2

9. On or about December 13, 2017, DOOLITTLE is pictured on BUSINESS-1 surveillance footage picking up an online order of goods placed under a false and/or stolen identity, IDENTITY-2, in Commack, New York. The online order was placed using stolen credit card information.

10. From in or around December 2017 through in or around January 2018, approximately forty-two (42) additional fraudulent online orders were placed with BUSINESS-1 under IDENTITY-2.

DOOLITTLE's use of IDENTITY-3

11. On or about January 27, 2018, DOOLITTLE is pictured on BUSINESS-1 surveillance footage picking up an online order for goods placed under a false and/or stolen identity, IDENTITY-3, in Rosedale, New York. The online order was placed using stolen credit card information from an IP address ending in 239.

12. From in or around January 2018 through in or around March 2018, approximately thirty (30) additional fraudulent online orders were placed with BUSINESS-1 under IDENTITY-3 from multiple IP addresses, including the IP address ending in 239.

DOOLITTLE's use of IDENTITY-4

13. On or about December 30, 2017, DOOLITTLE is pictured on BUSINESS-1 surveillance footage picking up an online order for goods placed

under a false and/or stolen identity, IDENTITY-4, in Brick Township, New Jersey. The online order was placed using stolen credit card information.

14. From in or around December 2017 through in or around January 2018, approximately twenty-six (26) additional fraudulent online orders were placed with BUSINESS-1 under IDENTITY-4.

Aggravated Identity Theft

DOOLITTLE's use of VICTIM-1's Identity

15. In or around May 2018, law enforcement interviewed an actual person ("VICTIM-1") residing in Florida and whose personal identifiers, including his/her full name and current address, matched an identification used by DOOLITTLE to pick up fraudulently purchased goods at BUSINESS-1. VICTIM-1 confirmed with law enforcement that the identification used by DOOLITTLE contained his/her personal information and that he/she did not know DOOLITTLE, nor did he/she authorize DOOLITTLE to use his/her personal information.

16. Specifically, on or about September 11, 2017, DOOLITTLE is pictured on BUSINESS-1 store surveillance footage returning goods in Piscataway, New Jersey. The goods had been purchased online with stolen credit card information under VICTIM-1's name. BUSINESS-1 surveillance footage shows that to effectuate the store return, DOOLITTLE presented a Florida driver's license bearing VICTIM-1's personal information together with DOOLITTLE's picture.

DOOLITTLE'S Co-Conspirators

17. CO-CONSPIRATOR-1 has been identified on BUSINESS-1 surveillance footage with DOOLITTLE at BUSINESS-1 stores in New Jersey, New York, Pennsylvania, and South Carolina, picking up and returning goods purchased with stolen credit card information under DOOLITTLE'S known aliases, including but not limited to IDENTITY-1 through -4.

18. CO-CONSPIRATOR-2 has been identified on BUSINESS-1 surveillance footage at stores in New Jersey, New York, Minnesota, and South Carolina, picking up and returning orders purchased with stolen credit card information under DOOLITTLE'S known aliases, including but not limited to IDENTITY-1 through -4.

19. CO-CONSPIRATOR-3 has been identified on BUSINESS-1 surveillance footage at stores in New York picking up goods purchased with stolen credit card information under his/her name and from an IP address associated with DOOLITTLE (ending in 228).